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Attorneys for Defendants Commonwealth of the Northern Mariana Islands,
 Nicole C. Forelli, William C. Bush, D. Douglas Cotton, L. David Sosebee,
 Andrew Clayton, and Pamela S. Brown ("CNMI Defendants")

UNITED STATES DISTRICT COURT
 FOR THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW,

 Plaintiff,

 vs.

CIVIL ACTION NO. 05-0027

COMMONWEALTH OF THE NORTHERN
 MARIANA ISLANDS, NICOLE C.
 FORELLI, former Acting Attorney General of
 the CNMI, in her personal/ individual capacity,
 WILLIAM C. BUSH, former Assistant
 Attorney General of the CNMI, in his personal/
 individual capacity, D. DOUGLAS COTTON,
 former Assistant Attorney General of the CNMI,
 in his personal/ individual capacity, L. DAVID
 SOSEBEE, former Assistant Attorney General
 of the CNMI, in his personal/ individual
 capacity, ANDREW CLAYTON, former
 Assistant Attorney General of the CNMI, in his
 personal/ individual capacity, UNKNOWN
 AND UNNAMED PERSONS IN THE
 CNMI, in their personal/ individual capacities,
 PAMELA S. BROWN, former Attorney
 General of the CNMI, in her personal/
 individual capacity, ROBERT A. BISOM,
 AND JAY H. SORENSEN,

 Defendants.

**CNMI DEFENDANTS' ANSWER
 TO CROSS CLAIM
 FILED BY DEFENDANT
 ROBERT A. BISOM**

1 Defendants Commonwealth of the Northern Mariana Islands, Nicole C. Forelli,
2 William C. Bush, D. Douglas Cotton, L. David Sosebee, Andrew Clayton, and Pamela S.
3 Brown ("CNMI Defendants") answer the correspondingly numbered paragraphs of
4 defendant Robert A. Bisom's "ANSWER TO FOURTH AMENDED COMPLAINT;
5 AFFIRMATIVE DEFENSES; CROSSCLAIM [and] DEMAND FOR JURY TRIAL" as
6 follows: 1. Denied.
7 2. Denied.
8 3. Denied.

9 **AFFIRMATIVE DEFENSES**

10 1. Defendant Bisom's Cross Claim fails to state a claim against these defendants
11 upon which relief can be granted.

12 2. The Court is without subject matter or supplemental jurisdiction over Bisom's
13 local law cross claim against the CNMI Defendants.

14 3. Defendants are immune.

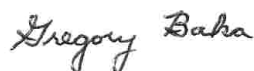
15 4. Bisom's claim against the CNMI Defendants is barred by the doctrines of issue
16 and claim preclusion, res judicata and collateral estoppel.

17 5. Plaintiff Bradshaw's claims against defendant Bisom are wholly separate and
18 distinct from his claims against the CNMI Defendants.

19 DATED this 3rd day of March, 2007.

20 OFFICE OF THE ATTORNEY GENERAL

21 MATTHEW T. GREGORY # F0205
22 Attorney General

23 

24 GREGORY BAKA # F0199
25 Deputy Attorney General

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(d), the undersigned declarant states as follows:

1. I am eighteen years of age or older, and I certify that I caused to be served the following documents to the last known address(es) listed below on the date(s) indicated.

2. As set forth below, this service was accomplished by personal delivery; U.S. Mail; deposit with Clerk of Court (in attorney box), cf. Fed. R. Civ. P. 5(b)(2)(D); or electronic service, see Local Rule 5.1.

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Fax: N/A

Via U.S. Mail

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Via Electronic Service

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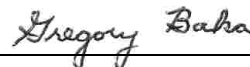
Via E-Mail

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Via Electronic Service

3. I declare under penalty of perjury that the foregoing is true and correct. Executed on Saturday, 3 March 2007.



Deputy Attorney General

Attorney for Defendants Commonwealth of the Northern Mariana Islands, Nicole C. Forelli, William C. Bush, D. Douglas Cotton, L. David Sosebee, Andrew Clayton, and Pamela S. Brown ("CNMI Defendants")